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January 29, 2025

VIA ECF

Honorable Rukhsanah L. Singh, U.S.M.J.
United States District Court
District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State St.
Trenton, NJ 08608

Re: *In re: Insulin Pricing Litigation*, No. 2:23-md-03080-BRM-RLS
MDL No. 3080 | Deadline for Responses to ECF Nos. 397, 398, and 399

Dear Judge Singh:

Pursuant to CMO #17 [ECF 386], Defendants Caremark Rx, LLC, Caremark LLC, and Caremark PCS Health, LLC (collectively, “CVS Caremark”); Express Scripts, Inc., Medco Health Solutions, Inc., and Express Scripts Administrators, LLC (collectively, “Express Scripts”); and OptumRx, Inc. (collectively, the “PBM Defendants”) each intend to respond to the Letters Regarding Current Discovery Disputes Involving PBM Defendants [ECF 397], Current Discovery Disputes Involving Express Scripts [ECF 398], and Current Discovery Disputes Involving Optum [ECF 399] that Plaintiffs filed on January 28, 2025, as applicable.

The PBM Defendants each propose to respond separately to Plaintiffs’ letters on or before Wednesday, February 5, 2025. If that date is acceptable, we respectfully request that you indicate the Court’s approval by so ordering this letter.

Thank you for your consideration of this request and your continuing attention to this matter.

Respectfully submitted,

/s John D. Tortorella

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Caremark LLC, and Caremark PCS Health,
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/s/ Jason R. Scherr

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Medco Health Solutions, Inc., and Express
Scripts Administrators, LLC*

/s/ Thomas P. Scrivo

Thomas P. Scrivo

Counsel for Defendant OptumRx, Inc.

cc: Honorable Brian R. Martinotti, U.S.D.J.
All counsel of record

SO ORDERED:

Hon. Rukhsanah L. Singh, U.S.M.J.